

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS)

**Petition for a Certificate of Public Convenience)
and Necessity, pursuant to Section 8-406 of the)
Illinois Public Utilities Act, and an Order pursuant)
to Section 8-503 of the Public Utilities Act, to)
Construct, Operate and Maintain a New High)
Voltage Electric Service Line in the Counties of)
Peoria and Knox, Illinois.)**

Docket No. 14-0514

**OBJECTIONS TO THE PETITION TO INTERVENE OF
CITIZENS AGAINST ROUTE B**

Block Farms, Inc., Jean A. Brodine, Robert R. Humphreys' Estate, Gloria Jean Humphreys, Moffett, Valrie M. Moffett, Sally J. Ramp, Roshan LLLP, Wild Rose Farm, Inc., Pauline Johnson Family Limited Partnership, Randall W. Moon, Richard T. Moon, G. Roger Moon, and Kathryn Moon Trust, & Charles Zelnio, (collectively the "SP Parties") state the following objections to the Petition for Leave to Intervene filed by "Citizens Against Route B," hereinafter "CARB."

1. December 15, 2014, a group of landowners, calling themselves CARB, filed a Petition to Intervene. The Petition to Intervene appears to assert that CARB itself¹ should be an intervenor rather than the individual members the it lists on Exhibit A. The Administrative Law Judge should require CARB to state whether it is requesting intervention only for itself or for persons listed on its Exhibit A.

2. Further, CARB does not claim any specific interest in the subject matter of these proceedings. The Petition to Intervene states that its "list of property owners and interested parties are all adversely affected by Ameren's proposed alternate Route B."

¹ A review of the Illinois Secretary of State's business entity registries do not show CARB as being a legal entity.

PTI, ¶ 1. This conclusory statement is unsupported anywhere in the Petition. The Information provided for CARB members consists solely of the names of the members and – apparent mailing – addresses. Many addresses are great distances from ATXI's proposed Route B.

3. The SP Parties object to the intervention of CARB, itself. CARB is not a legal entity and, as such, it has no interests of any kind, let alone any that these proceedings could affect.

4. The SP Parties do not intend to oppose intervention by persons or entities who own, lease, or farm property located along ATXI's proposed Route B. However, the information that CARB has provided is insufficient to enable the SP Parties to determine whether or not this is the case.

5. Accordingly, the Petition to Intervene should either:

a. Be granted subject to: (i) by a date certain, the Petition be amended to clarify that the individual members of CARB are the intervenors and (ii) only for those individual members providing sufficient information to show interest in property actually affected by ATXI's Route B; or

b. Be denied for failing to provide sufficient information to determine the purported claimed interest of CARB or its members.

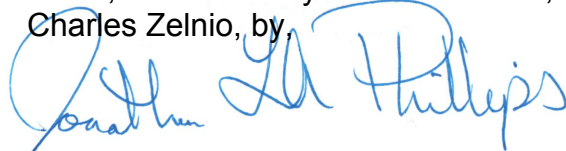
6. Additionally, the Petition claims to name the "initial members" of CARB. PTI, ¶ 2. In doing so, the Petition intimates that more members may be intervening in the future. If this is the case, and the Petition is granted, it should be conditioned upon the requirement that all additional individual intervenors, claiming to be a member of

CARB, provide information sufficient to show interest in property actually affected by ATXI's Route B.

WHEREFORE, The SP Parties respectfully request that: (i) the members of CARB be required to intervene individually, (ii) the members of CARB provide sufficient information, in an amended petition, to show that they have an interest in the subject matter of these proceedings, or (iii) the Petition to Intervene be denied.

Dated: 12/23/14

Respectfully submitted,
Block Farms, Inc., Jean A. Brodine,
Robert R. Humphreys' Estate, Gloria
Jean Humphreys, Moffett, Valrie M.
Moffett, Sally J. Ramp, Roshan LLLP,
Wild Rose Farm, Inc., Pauline Johnson
Family Limited Partnership, Randall W.
Moon, Richard T. Moon, G. Roger
Moon, and Kathryn Moon Trust, &
Charles Zelnio, by,

A handwritten signature in blue ink, appearing to read "Jonathan LA Phillips", is written over a horizontal line.

One of their attorneys
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